

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

SEP 28 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA

Plaintiff,

v.

JASMINKA RAMIC,

Defendant.

Case No. SI 4:15 CR 00049 CDP DDN

SUPERSEDING INFORMATION

COUNT I
(CONSPIRACY)

The United States Attorney charges that:

A. The conspiracy

1. Beginning on a date unknown but no later than in May 2013, and continuing to through February 2015, with the exact dates being unknown, in the Eastern District of Missouri and elsewhere,

JASMINKA RAMIC

the defendant herein, along with Ramiz Zijad Hodzic a/k/a Siki Ramiz Hodzic, Sedina Unkić Hodzic, Abdullah Ramo Pazara, a/k/a Abdullah Ramo Mudzahid, a/k/a Abdullah Pazara, a/k/a Abdullah Al Amriki, named but not indicted, and other persons known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other, to commit an offense against the United States, that being to provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section

2339A(b), including: currency and monetary instruments (collectively “money”), and property knowing and intending that such money and property were to be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Section 956(a), that is, a conspiracy to commit at places outside of the United States acts that would constitute offenses and murder and maiming if committed in the special maritime and territorial jurisdiction of the United States.

B. Manner and Means

2. In furtherance of the conspiracy, and to effect the illegal objects thereof, the defendant Jasminka Ramic, along with Siki Ramiz Hodzic, Sedina Unkcic Hodzic, Abdullah Ramo Pazara, and other persons known and unknown to the Grand Jury, used the following manner and means, among others, to accomplish the conspiracy.

3. Defendant Jasminka Ramic collected money and property and thereafter sent and transferred the same from Illinois to Siki Ramiz Hodzic and Sedina Unkcic Hodzic in St. Louis, Missouri, who thereafter sent and transferred to the money and property to Abdullah Ramo Pazara and others known and unknown to the Grand Jury who were fighting in Syria, Iraq and elsewhere.

C. Overt Acts

4. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Missouri and elsewhere:

5. On or about September 20, 2013, defendant Jasminka Ramic transferred, or caused to be transferred, \$300.00 in United States currency, via Western Union, from Illinois to defendant Siki Ramiz Hodzic in St. Louis, Missouri, with the money being received on or about September 23, 2013.

6. On or about October 28, 2013, Sedina Unkic Hodzic shipped, or caused to be shipped, six boxes via the United State Postal Service containing United States military uniforms, combat boots, tactical clothing and gear, military surplus goods, firearms accessories rifle scopes, optical equipment and range finders, first aid supplies, and other equipment from St. Louis, Missouri to a third party intermediary in Gaziantep, Turkey, with all of the boxes arriving in Turkey by November 2013.

7. On or about November 17, 2013, defendant Jasminka Ramic transferred, or caused to be transferred, \$250.00 in United States currency, via Western Union, from Illinois to defendant Siki Ramiz Hodzic in St. Louis, Missouri, with the money being received on or about November 19, 2013.

8. On or about December 23, 2013, defendant Jasminka Ramic transferred, or caused to be transferred, \$150.00 in United States currency, via Western Union, from Illinois to defendant Siki Ramiz Hodzic in St. Louis, Missouri, with the money being received on or about December 24, 2013.

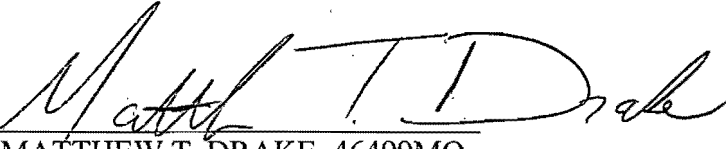
9. While and subsequent to obtaining money and supplies from defendant Ramic, among others, Siki Ramiz Hodzic and Sedina Unkic Hodzic, used the money to purchase materials and supplies, to include: a United States military jacket, combat boots, and a rifle scope, among other things.

10. After obtaining said materials and supplies, Siki Ramiz Hodzic and Sedina Unkic Hodzic, shipped and transferred the same materials and supplies to Abdullah Ramo Pazara, and others, who were in Syria, Iraq, and elsewhere to be used in furtherance of military style activities to include injuring and killing others abroad.

All in violation of, and punishable under, Title 18, United States Code, Section, 371.

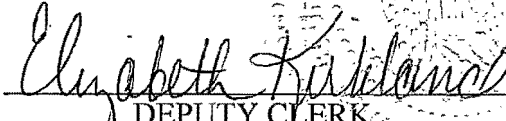
UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Matthew Drake, Assistant United States Attorney for the Eastern District of Missouri,
being duly sworn, do say that the foregoing information is true as I verily believe.


MATTHEW T. DRAKE, 46499MO

Subscribed and sworn to before me this 28 day of September, 2015


CLERK, U.S. DISTRICT COURT

By: 
DEPUTY CLERK